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January 9, 2020

VIA ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Ramon K. Jusino v. Federation of Catholic Teachers, Inc.*
(19 CV 6387) (ENV) (ST)

Dear Judge Vitaliano:

This firm represents defendant Federation of Catholic Teachers, Inc. in the above matter. We write to request reconsideration of Your Honor's order of today terminating the parties' request for approval of a proposed briefing schedule.

Because Plaintiff Ramon K. Jusino is *pro se*, we sought to follow Rule III.A which provides that a pre-motion conference is required where "all parties are represented by counsel," and states that "[N]o pre-motion conference shall be required where any party is *pro se*. Because plaintiff is *pro se*, we did not request a pre-motion conference, but we followed III.B which provides that "where permission is not needed, the parties are to jointly file a letter proposing a briefing schedule."

Therefore, we request reconsideration of the Court's termination of the parties' request for approval of the proposed briefing schedule: Defendant's motion papers to be served on January 13, 2020; plaintiff's opposition papers to be served March 13, 2020; defendant's reply papers to be served March 27, 2020. If the Court's pre-motion conference request rules have changed and require us to request a conference, we apologize for our confusion.

Thank you for your consideration.

Respectfully yours,

/s/ Jane Lauer Barker

Jane Lauer Barker

cc: Ramon K. Jusino, *pro se* (via email)